

EXHIBIT 18

**THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GALLERIA 2425 OWNER, LLC,

Debtor.

Chapter 11

Case No. 23-34815

**DECLARATION OF DWARD DARJEAN IN SUPPORT OF EMERGENCY MOTION
OF JETALL COMPANIES, INC. FOR STAY PENDING APPEAL**

PURSUANT TO 28 U.S.C. § 1746, I HEREBY DECLARE AS FOLLOWS:

1. **I, DWARD DARJEAN**, am the representative of Jetall Companies, Inc. Jetall holds a lease agreement relating to the Property. It is my understanding that on December 5, 2023, the owner of the property, Galleria 2425 Owner, LLC, went into bankruptcy. However, the lease is valid and has never been terminated. Jetall has never been in breach of the covenants of the lease agreement; in fact, Jetall does not owe any past due rent and has been in full compliance of its obligations under the lease agreement since the time it was entered into.

2. After the building was allegedly sold, Houston 2425 Galleria, LLC started eviction proceedings against Jetall by filing a forcible entry and detainer action before a justice of the peace in a state court, entitled: *Houston 2425 Galleria, LLC v. Jetall Companies, Inc.*, Cause No. 241100353166 (Harris County Justice of the Peace, Precinct 1 Place 1). At trial, the justice court ruled that the Houston 2425 Galleria, LLC had provided Jetall insufficient notice and therefore the court had no jurisdiction over the case. Thereafter, Houston 2425 Galleria, LLC filed a new notice purporting to give Jetall until December 18, 2024 (30 days from the date of the said notice) to

vacate the Property. Additionally, at trial, the justice of the peace entered an order disqualifying the Houston 2425 Galleria, LLC's counsel, Jackson Walker, LLP, because that firm had represented Jetall in previous litigation and had a conflict of interest. The disqualification extended not only to Jackson Walker, but also to its co-counsels, Pillsbury Winthrop, LLP, including any case involving a party in the justice of the peace case or the matters and issues relating thereto. Jetall was a party in that case.

3. On December 4, 2024, less than a week after Houston 2425 Galleria, LLC provided Jetall notice to vacate, and before the 30-day period to vacate it promised had expired, Houston 2425 Galleria, LLC went to the bankruptcy court to evict Jetall, asking that the bankruptcy court to adjudicate a matter that had already been decided against it in the justice court. Nonetheless, It is my understanding that there is an automatic stay in place in at least two separate bankruptcies. There is a bankruptcy proceeding that concerns a different entity affiliated with Ali Choudhri (Jetall's president), which is pending in the United States Bankruptcy Court for the Western District of Texas, Austin Division, Cause No.: 24-10120-smr, *In re Texas REIT, LLC*. In that case, Osama Abdullatif, a litigant in an adversary proceeding pending in the Southern District that stems from the Texas REIT bankruptcy, alleged that the debtor in that case is an alter ego of Ali Choudhri, and that all of Ali Choudhri's other entities are also alter egos of Ali Choudhri and each other, including Jetall. Just days before Houston 2425 Galleria, LLC filed its initial emergency motion in this case, Judge Marvin Isgur determined that that the automatic stay protecting Texas REIT, LLC probably applies to all of Ali Choudhri's affiliated entities. But Judge Isgur abstained from answering that question, referring the question instead to Judge Robinson, who would be hearing the *In re Texas REIT, LLC bankruptcy*, to determine the scope of the automatic stay in that action. Furthermore, on December 4, 2024, Jetall became the subject of an Involuntary Chapter 11

Bankruptcy Petition in the United States Bankruptcy Court for the Western District of Texas, Austin Division, Cause No. 24-11544.

4. On Friday, December 6, 2024, the bankruptcy court issued an emergency order that Jetall immediately vacate the Property and remove its personal property from the premises. The bankruptcy court gave Jetall only five (5) business days to leave, or Houston 2425 Galleria, LLC would be entitled to seek writs of entry executed through the United States Marshall Service or the Harris County Sheriff's Office to complete the eviction.

5. Unfortunately, notwithstanding the bankruptcy court's order, there is simply not enough time for Jetall to vacate the Property; especially, given the state of disrepair in which Houston 2425 Galleria, LLC, the purported new Purchaser, has left the Property. Presently, none of the elevators in the building are working, as can be seen in the true and correct photographs attached as **Exhibit A**. Jetall is a major tenant in the Property. The premises leased by Jetall in this building is filled with heavy furnishings, valuable art, and antiques, which cannot be disassembled and moved in five days.

6. Jetall has tried to manage the logistics of moving its offices on an emergency basis, and received estimates from moving companies to conduct the move. Regrettably, none of the movers in the entire state of Texas can commit to this rather expedited five-days ultimatum of the bankruptcy court to vacate the building. It is essentially impossible. According to an estimate I obtained from a company called Smooth Moves Texas (a true and correct copy of which is attached as Exhibit B), it would take "approximately fourteen to twenty-one (14-21) days to complete" the move, although that estimate "is 100% dependent on access to working elevators."

7. I declare under the penalty of perjury, that the foregoing is true and correct.

Executed on this 10th day of December, 2024.

/s/ Dward Darjeon

**Dward Darjeon
representative, Jetall Companies, Inc.**

EXHIBIT A





EXHIBIT B



Smooth Moves Texas

Nate Campbell
175 W 6th St. Suite D
Kemah, TX 77565
(832) 409-7572
nate@smoothmovestexas.com

Date: 12/8/2024

Jetall Companies

2425 W Loop S, Houston, TX 77027

Subject: Estimated Time for Your Move

Dear Mr. Choudhri,

Thank you for choosing Smooth Moves Texas to assist with your upcoming relocation. We understand how important this move is to you, and our team is committed to ensuring a smooth, stress-free experience.

After carefully reviewing the details of your move, we estimate that it will take approximately fourteen to twenty-one (14-21) days to complete. This estimate includes adjustments for fuel, labor, reassembly and appliances. This is 100% dependent on access to one, or ideally two, working elevators. Our team of experienced movers will work diligently to complete your move within the estimated time frame while maintaining the utmost care for your belongings.

We strive to provide transparent communication throughout the process. If you have any additional requests, changes, or questions about the timeline or services, please don't hesitate to contact us.

Once again, thank you for trusting Smooth Moves Texas. We look forward to delivering a seamless moving experience for you.

We look forward to making your move smooth and stress-free!

Nate Campbell | Smooth Moves

(832) 409 - 7572